

simulator program performs display of a representation of the operator system interface defined by the definitional tables input in the providing step and allows a user to select components of the operator system interface, using a pointing device, in order to view information about the selected component on a display device or to effect a change in keysets or menus, thereby modifying said representation of the operator system interface within said simulator program, and

modifying said definitional tables to correspond to said modifying of said representation to reprogram said operator system interface.

5. (Amended) A method as recited in claim 4, further comprising the step of:

generating updated operational operator system interface definitional tables.

REMARKS

Claims 1 - 10 remain active in this application. Claims 1 and 5 have been amended to improve form of claim 1 and to include a recitation of claim 5, in a somewhat expanded form in the interest of clarity, to claim 1. Support for the amendments of the claims is found throughout the application, particularly in the description on pages 3 and 4 of the specification as originally filed. No new matter has been introduced into the application.

The Examiner has provided an explanation of claim language interpretation indicating that the phrase "effect a change in keysets or menus" refers to "the user being able to define hotkeys in the user interface". This claim language interpretation is respectfully traversed since the term "hotkey" or other forms of the term is not found in the specification and

the asserted interpretation is thus seen to potentially trivialize the invention and to be an exercise in impermissible hindsight in tending to conform the Examiner's interpretation and understanding of the invention to more familiar, known arrangements which may have a function which is superficially similar in some respects to a result of the invention. Further, the asserted interpretation does not provide any definition of a "hotkey" which may or may not be a more or less colloquial expression for any of a number of programmable key arrangements in the Examiner's view. Moreover, the interpretation asserted by the Examiner may also be vague in that it appears to possibly comprehend a single hotkey. It also appears, as will be discussed in greater detail below, that the Examiner has, through asserting the interpretation, disregarded the plain meaning of the language in question and disregarded other recitations of the claims entirely. Therefore, while it is conceded that the Examiner should give the claim language the broadest *reasonable* interpretation, such an interpretation should not trivialize the invention, construe the claims language through hindsight, conflict in any way with the plain meaning of the claim language or reduce weight accorded to any recitation of the claims. Accordingly, to clarify the record, reconsideration and withdrawal of the Examiner's statement interpreting the above-noted language is respectfully requested.

Claims 1 - 10 have been rejected under 35 U.S.C. §102 as being anticipated by Isreal et al. This ground of rejection is respectfully traversed as being clearly in error and which is respectfully submitted to be even more clear in view of the above amendments.

Specifically, Isreal et al. is directed to the provision of additional arrangements in a functional software system to allow prototyping on that system while it is running. However, the arrangement of

Isreal et al. does not address the issue of providing simulation and/or prototyping of an operator interface system where running of the operator interface system, *itself*, would be prohibitively expensive for such purposes, either because of the cost of operation of the computer on which it is run or the need for operation of other expensive machinery while the operator interface system is being run. In fact, at the present time, as discussed in the present application, both conditions may be presented, for example, in complex computer systems used for avionics in aircraft which also effectively prohibit any possibility of ambiguity in control functions being prototyped.

It is this latter function, in particular, which is addressed by the present invention. Specifically, the invention provides for the operator interface system to be defined in definitional tables and generating an operator interface simulator program from these definitional tables which allows effecting of changes in the operator interface system, precisely as recited in the claims as originally filed. Therefore, the invention, as originally claimed provides a simulator for the operator interface which does not require running the operator interface itself as is required in the arrangement of Isreal et al. Therefore, it is clear that Isreal et al. does not anticipate and claim in the application since it does not teach (or suggest) the generation of an operator interface simulator program based on the definitional tables, much less generating a simulator program having the functions recited in the claims as filed.

These features of the present invention support the function of allowing the simulator program to be run on a much less expensive processor and avoiding any need for operation of any other equipment concurrently with running such a processor. That is, the invention,

as originally claimed allows simulation on, for example, a stand-alone personal computer or laptop. Prototyping, which can be an extensive and time-consuming operation involving a large number of prospective users can also be performed in the same manner and at similarly low cost and high convenience. Further, when corresponding changes are made in the definitional tables corresponding to the prototyping modifications, as now recited in claim 1, the prototyping of the original system is facilitated at reduced cost since the modified definitional tables can be simply loaded into the operator interface system, itself.

In other words, it is believed that the language of the claims, as filed, clearly required a simulator program distinct from the operator system itself since it is recited as being generated and forming a representation of the operator system interface defined by the definitional tables and this recitation is not answered by the prototyping add-on (which allows a function somewhat similar to programming of hotkeys) for the operator interface system *itself* as presented in Isreal et al., possibly due to the improper interpretation of other claim language as discussed above. Accordingly, it is seen that no *prima facie* demonstration of anticipation of any claim in this application has been made and it is respectfully submitted that the stated ground of rejection is not only in error as to the claims as originally filed but clearly untenable in regard to the claims as amended. Accordingly, reconsideration and withdrawal of the stated ground of rejection based on Isreal et al. is respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully

submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



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